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June 22, 2022

*Filed via ECF*

The Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*Re: United States v. Douglass Mackey, Criminal Docket No. 21-0080 (NGG)*

Dear Judge Garaufis:

On behalf of Douglass Mackey, and without objection from the government, I write to request permission to file a memorandum of law in support of Mr. Mackey's motion to dismiss which I expect will exceed 25 pages. The motion is due this Friday. My current draft of the memorandum is about 30 pages. While revisions over the next two days may shorten or lengthen the draft, and while I will make best efforts to be concise and avoid repetition, my best estimate is that the final memorandum will exceed 25 pages, but be no more than 35 pages. I submit this motion today without knowing the precise page number rather than await the day of filing. The anticipated length of the memorandum is a consequence of the novel and important legal issues raised by the case. AUSA Paulsen has advised me that he does not object to this motion.

I appreciate the Court's consideration.

Respectfully submitted,

*/s/ Andrew J. Frisch*  
Andrew J. Frisch

cc: AUSA Erik Paulsen  
AUSA Olatokunbo Olaniyan  
AUSA William Gullotta